

EXHIBIT "B"

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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF ALASKA

Salley C. Purser,)
)
Plaintiff,)
)
v.)
)
Josef F. Boehm, Allen K. Bolling,)
and Bambi Tyree,)
)
Defendants.)

Case No: A05-0085 (JKS)

**PLAINTIFF'S RESPONSES TO DEFENDANT BOEHM'S SECOND SET OF
DISCOVERY REQUESTS**

INTERROGATORY NO. 1: Question compounding in nature and this information has already been supplied to the Defendant on more than one occasion. Defendant has, in his own possession, the information requested with regard to the Federal Criminal charges he pled guilty to. The Plaintiff knows of the witnesses but does not personally know the witnesses, except for "E.A.", Kimberly Swentek, Bambi Tyree, Leslie Williams, Allen Bolling, Josef Boehm, Paxton Purser and Gerald Barnes. Some of these individuals the Plaintiff met while at Defendant Boehm's home during the period of 2001-2003.

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The other witnesses in this action are doctors and counselors, care providers and Dr. Rose and Francis Gallella which are two experts hired by the Plaintiff. Their vitae's, name, addresses and phone numbers have been supplied to Defendant Boehm twice.

INTERROGATORY NO. 2: At the time the Plaintiff met Defendant Boehm she did not attend school. The Plaintiff completed 9th grade and received her GED from "9 Star" in March 2005. Plaintiff also attended the Adult Learning Center in Anchorage, Alaska to complete her GED. This institution no longer exists. The Plaintiff was suspended in the 10th grade for suspected drug use. These were allegations but no proof of actual drug use. The Plaintiff decided on her own not to return to school after suspension.

INTERROGATORY NO. 3: The Plaintiff was arrested in May 2004 for misdemeanor possession of crack cocaine and is on Federal Probation until August 2009.

INTERROGATORY NO. 4: The Plaintiff has previously supplied this information twice to the Defendant, once in Preliminary Disclosures and by supplement months later.

INTERROGATORY NO. 5: The Plaintiff objects to this Interrogatory as it is overbroad, it shows no relevance and has a blanket time frame with no dates established.

INTERROGATORY NO. 6: Answered.

REQUEST FOR ADMISSION NO. 1: Admit.

REQUEST FOR ADMISSION NO. 2: Denied.

REQUEST FOR ADMISSION NO. 3: Admit. One time only.

REQUEST FOR ADMISSION NO. 4: Denied.

REQUEST FOR ADMISSION NO. 5: Admit.

REQUEST FOR ADMISSION NO. 6: Admit.

REQUEST FOR ADMISSION NO. 7: Admit. Twice only.

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REQUEST FOR ADMISSION NO. 8: Admit.

REQUEST FOR ADMISSION NO. 9: Admit.

REQUEST FOR ADMISSION NO. 10: Denied.

REQUEST FOR ADMISSION NO. 11: Admit.

REQUEST FOR ADMISSION NO. 12: Admit.

REQUEST FOR ADMISSION NO. 13: Denied.

REQUEST FOR ADMISSION NO. 14: No Admission No. 14. Defendant did not properly number his admissions.

REQUEST FOR ADMISSION NO. 15: Asked and Answered.

REQUEST FOR ADMISSION NO. 16: Denied.

REQUEST FOR ADMISSION NO. 17: Admit.

REQUEST FOR ADMISSION NO. 18: Denied.

REQUEST FOR ADMISSION NO. 19: Denied.

REQUEST FOR ADMISSION NO. 20: Admit.

REQUEST FOR ADMISSION NO. 21: Denied.

REQUEST FOR ADMISSION NO. 22: Plaintiff has no recollection and therefore Denied.

REQUEST FOR ADMISSION NO. 23: Denied.

REQUEST FOR ADMISSION NO. 24: Plaintiff objects to the verbage "traded sexual favors" and admits to having sex with other individuals.

REQUEST FOR ADMISSION NO. 25: Plaintiff once again objects to the verbage "traded sexual favors". Mr. Bucher was Plaintiff's boyfriend at one time.

REQUEST FOR ADMISSION NO. 26: Plaintiff has no knowledge and therefore Denied.

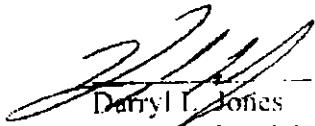
REQUEST FOR ADMISSION NO. 27: Denied.

REQUEST FOR ADMISSION NO. 28: Denied. Defendant Boehm was the primary cause of my drug dependency.

REQUEST FOR ADMISSION NO. 29: Denied. Plaintiff was never a prostitute.

REQUEST FOR ADMISSION NO. 30: Denied.

DATED this 6th day of December 2006 at Anchorage, Alaska.



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NOTARY PUBLIC CERTIFICATION

State of Alaska

Notary Public for the State of Alaska

I, the undersigned, being first duly sworn, depose that, before me, the undersigned, the following person or persons appeared and acknowledged to me that they are the author(s) of the foregoing instrument, and that they executed the same for the purposes and in the capacity stated therein.

I, the undersigned, being first duly sworn, depose that, before me, the undersigned, the following person or persons appeared and acknowledged to me that they are the author(s) of the foregoing instrument, and that they executed the same for the purposes and in the capacity stated therein.

Sally Porter
Sally Porter

Subscribed and sworn to before me this 14 day of November, 2006.

State of Alaska
NOTARY PUBLIC
Deborah L. Fenton-Bushue
Commission No: 101289

Deborah L. Fenton-Bushue
Notary Public for the State of Alaska
2/14/2009

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CERTIFICATE OF SERVICE

This is to certify that on the 8th day of December, 2006, a true and correct copy of the foregoing document was caused to be mailed to the following parties of record via United States Certified Mail:

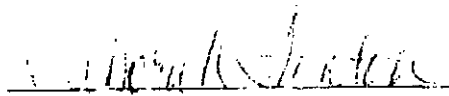
Allen K. Bolling
Inmate No: 14911-006
USP Terre Haute
U.S. Penitentiary
P.O. Box 12015
Terre Haute, IN 47801
CM No.: 7006 0810 0000 2976 8006

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